

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

MICHAEL ARVEY,

Plaintiff,

vs.

Case No. 18-cv-00185

SANDRA LYNN FIELSTRA, FRUITPORT
COMMUNITY SCHOOLS, ROBERT SZYMONIAK,
ROBERT ROGERS, LAUREN CHESNEY, and
PROFESSIONAL EDUCATIONAL SERVICES
GROUP, LLC, a Michigan Limited Liability
Company,

Hon. Paul L. Maloney

Defendants.

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**MOTION TO WITHDRAW AS COUNSEL
FOR DEFENDANT PROFESSIONAL EDUCATIONAL
SERVICES GROUP, LLC**

MOTION TO WITHDRAW AS COUNSEL
FOR DEFENDANT PROFESSIONAL EDUCATIONAL
SERVICES GROUP, LLC

NOW COMES Attorneys, PLUNKETT COONEY, and for its Motion to Withdraw as counsel for Defendant Professional Educational Services Group, LLC (hereinafter “PESG”), states as follows:

1. This matter involves allegations that a student and a high-school secretary engaged in inappropriate physical conduct.
2. The secretary, Defendant Fielstra, was supplied to Fruitport Community Schools through contractual arrangements with PESG.
3. The Scheduling Order for this case is as follows:
 - a. discovery cut off – April 30, 2019;
 - b. dispositive motions - June 28, 2019;
 - c. Settlement Conference – October 9, 2019; and,
 - d. Final Pretrial conference – November 18, 2019.
4. Due to the dates in the current Scheduling Order and the limited discovery completed to date, there is no prejudice to PESG if the Court grants the relief requested in this Motion.
5. The parties are scheduled for facilitation on March 20, 2019.
6. Pursuant to M.R. P.C. 1.16 (b) (4), 5 and (d), termination of the attorney-client relationship is appropriate.

7. PESG is out of business. The former owner of the entity, Mr. Bledsoe, is aware of this Motion and its requested relief.

8. Upon information and belief, counsel for Co-Defendant and counsel for Plaintiff have no objection to the requested relief.

9. Pursuant to LR 83.30 (a), an attorney may withdraw an appearance by motion with leave of the court.

WHEREFORE, Plunkett Cooney requests that this Honorable Court enter an Order granting withdrawal as counsel for Defendant PESG, effective immediately upon entry of the Order.

PLUNKETT COONEY

/s/Michael D. Weaver

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PROOF OF SERVICE

I hereby certify that on March 7, 2019, a copy of Plunkett Cooney's Motion to Withdraw was electronically filed and the attorney(ies) of record received notice via the court's ECF system.

PLUNKETT COONEY

/s/Michael D. Weaver

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